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11 Attorneys for RABAB ABDULHADI

12 **UNITED STATES DISTRICT COURT**  
13 **NORTHERN DISTRICT OF CALIFORNIA**

JACOB MANDEL, CHARLES VOLK,	)	Case No.: 3:17-CV-03511-WHO
LIAM KERN, SHACHAR BEN-DAVID,	)	
MICHAELA GERSHON, MASHA	)	<b>DECLARATION OF COLLEEN</b>
MERKULOVA, and STEPHANIE	)	<b>FLYNN IN SUPPORT OF</b>
ROSEKIND,	)	<b>DEFENDANT, RABAB ABDULHADI'S</b>
Plaintiffs,	)	<b>MOTION FOR SANCTIONS</b>
v.	)	<b>PURSUANT TO 28 U.S.C. § 1927 AND</b>
BOARD OF TRUSTEES of the	)	<b>THE COURT'S "INHERENT</b>
CALIFORNIA STATE UNIVERSITY,	)	<b>AUTHORITY"</b>
SAN FRANCISCO STATE UNIVERSITY,	)	
RABAB ABDULHADI,	)	Date: May 29, 2019
in her individual capacity, and LESLIE	)	Time: 2:00 p.m.
WONG, MARY ANN BEGLEY, LUOLUO	)	Location: Courtroom 2, 17 <sup>th</sup> Floor
HONG, LAWRENCE BIRELLO,	)	Judge: William H. Orrick
REGINALD PARSON, OSVALDO DEL	)	Original Action Filed: June 19, 2017
VALLE, KENNETH MONTEIRO, BIRAN	)	Judgment Entered: October 29, 2018
STUART, and MARK JARAMILA, in their	)	Appeal Dismissed: March 29, 2019
official and individual capacities,	)	Remand to District Court: April 8, 2019
Defendants.	)	
	)	
	)	

DECLARATION OF COLLEEN FLYNN IN SUPPORT OF DEFENDANT, RABAB  
ABDULHADI'S MOTION FOR SANCTIONS PURSUANT TO 28 U.S.C. § 1927  
AND THE COURT'S "INHERENT AUTHORITY"

**DECLARATION OF COLLEEN FLYNN**

I, Colleen Flynn, hereby declare as follows:

I am an attorney at law, duly licensed to practice before all courts in the State of California and am a member of the bar of this Court. If called upon to do so, I could and would testify competently to the following:

1. I graduated Southwestern University School of Law in 2004. I am admitted to practice and have practiced before the Central District of California, Northern District of California and the United States Court of Appeals for the Ninth Circuit.

2. I practice mainly in the area of civil rights and civil liberties. A great many of these cases involve misconduct by police or by other government officials so I am continually dealing with §1983 issues.

3. These kinds of cases raise thorny questions about the differences between policies and practices, the degree of intent or knowledge required to defeat claims of qualified immunity, and when conduct the defendant claims is privileged does or does not get protection. It is often difficult to successfully get past the pleading stage without a very detailed understanding of the facts. These cases therefore require a great deal of investigation. It is not uncommon for civil rights lawyers to spend several hundred hours on investigation, briefing, and hearings before we are even allowed to conduct discovery.

4. I haven't talked with either Mr. Kleiman or his colleague Mr. Gharagozli about how they handled this case. But I can state from my own experience that lawyers who to take §1983 battles on a contingent fee or a *pro bono* basis try to use their time very strategically.

5. Fee expert Carol Sobel has informed me that my rate for 2019 is \$700 per hour. I have used that rate to settle a civil rights case and a FOIA case in 2019.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on April 19, 2019 in Los Angeles, California.

/s/ Colleen Flynn  
Colleen M. Flynn